

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RIC, THE  
PUERTO RICO PUBLIC BUILDINGS AUTHORITY, *et*  
*al.*,

Debtors

**PROMESA  
TITLE III**

Case No. 17-BK-03283 LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth and the Puerto  
Rico Public Buildings Authority  
(PBA)**

[Response to Docket #17104]

**GENESIS SECURITY SERVICES, INC. RESPONSE TO THREE HUNDRED THIRTY-FIFTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO RICO BUILDINGS AUTHORITY TO DUPLICATE CLAIMS**

To the Honorable United States District Judge Laura Taylor Swain:

**COMES NOW**, creditor of the Puerto Rico Building Authority, **Genesis Security Services Inc.** (“Genesis”), represented by the undersigned attorney, and very respectfully avers and prays as follows:

1. On June 18, 2021, the Commonwealth of Puerto Rico and the Puerto Rico Building Authority (“PBA” and together with the Commonwealth, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), filed the *Three Hundred Thirty-Fifth Omnibus Objection* (the “Objection”) to object various duplicate proofs of claims which they listed in their motion. Among the proof of claims that were objected, Debtors objected Genesis’ Claim No. 174424. **See Exhibit A of the Objection.**

2. As stated in **Exhibit A** of the Objection, the reason to object Genesis’ Claim No.174424 is because it “*asserts liabilities which are duplicative of another filed Proof of Claim*”. However, as this Honorable Court may confirm, Debtors failed to provide the identification number of the proof of claim to which they referred to. Debtors, however, explained that Genesis’ Claim No. 174436, in the amount of \$483,760.98, will remain as an open claim. **See Exhibit A of the Objection.**

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3. After reviewing the Claim's matrix, Genesis confirmed that in fact, its collection of money claim in the amount of \$483,760.95, was provided with three (3) different identification numbers; that is, **Claim No. 174436**, **Claim No. 174424**, and **Claim No. 174317**.

4. Accordingly, Genesis raises no objection to the removal of claims No. 174424 and No.174317 from the Claims Matrix.

5. However, Genesis reserves the right to oppose any future objections that Debtors might have against its collection of money claim in the amount of 483,760.95, identified by Debtors as the remaining claim No. 174436.

**WHEREFORE**, Genesis respectfully requests this Honorable Court to take notice that it has no objection to concede to Debtors' request to remove Claims No. 174424 and 174317 from the Claims Matrix, provided that, **Proof of Claim No. 174436** will remain as an open and active claim.

**RESPECTFULLY SUBMITTED** in San Juan, Puerto Rico, this 19<sup>th</sup> day of July, 2021.

**CERTIFICATION OF SERVICE:** I hereby certify that on this same date I electronically filed the foregoing with the Clerk of this Honorable Court using the CM/ECF System for the United States Bankruptcy Court, District of Puerto Rico which will send notification of such filing to the parties to their registered e-mail addresses.

*Attorney for Genesis Security Services, Inc.*

*s/Juan C. Nieves-González*

Juan C. Nieves-González

USDC-PR Bar No. 231707

Casillas, Santiago & Torres LLC

PO Box 195075

San Juan, PR 00919-5075

Tel.: (787) 523-3434

Fax: (787) 523-3433

jnieves@cstlawpr.com